

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

– *against* –

ANTHONY STEELE,

Defendant.

$$\begin{array}{c} \vdots \\ \vdots \\ \hline \lambda \end{array}$$

08 Cr. 62 (JSR)

NOTICE OF SUPPLEMENTAL
PRETRIAL MOTIONS
PURSUANT TO
RULE 12(b), FED.R.CRIM.P.

(filed electronically)

PLEASE TAKE NOTICE, that upon the annexed Declaration of Aaron J. Mysliwiec, Esq., the Exhibits thereto, the annexed Declaration of Alice L. Fontier, the annexed Declaration of Anthony Steele, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, ANTHONY STEELE, will move before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an order:

- (a) compelling all outstanding discovery;
- (b) suppressing any identification testimony and precluding any identification of Anthony Steele under the Due Process clause of the Fifth Amendment to the United States Constitution;
- (c) suppressing physical evidence obtained as fruit of an unlawful arrest in violation of the Fourth Amendment to the United States Constitution;
- (d) suppressing all statements under *Miranda* and on voluntariness grounds; and,
- (e) for any such other and further relief as to the Court seems just and proper.

Dated: April 14, 2008
New York, New York

Respectfully submitted,

/S/
Joshua L. Dratel
Aaron J. Mysliwicz
JOSHUA L. DRATEL, P.C.
2 Wall Street, 3rd Floor
New York, New York 10005
(212) 732-0707
jdratel@joshuadratel.com
amysliwicz@joshuadratel.com

Attorneys for Defendant Anthony Steele

To: THE HON. JED S. RAKOFF
UNITED STATES DISTRICT JUDGE

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK